

# SOUTHERN ENVIRONMENTAL LAW CENTER

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November 4, 2019

## **VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

RE: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) – S.C. Code Ann. Section 58-41-20(A)

South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Progress, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) – S.C. Code Ann. Section 58-41-20(A)

### **Docket Nos. 2019-185-E and 2019-186-E**

Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Coastal Conservation League ("CCL") and the Southern Alliance for Clean Energy ("SACE"), late-filed Exhibit Nos. 15 and 23.

At the hearing for the above-referenced dockets on October 22, 2019, James F. Wilson testified on behalf of the SACE and CCL. Following Mr. Wilson's testimony regarding flaws in the Duke Energy Progress, LLC ("DEP") and Duke Energy Carolina, LLC's ("DEC") (together "Duke Energy" or "the Companies") 2016 resource adequacy studies, and Duke Energy's refusal in other dockets to provide information and sensitivity analyses requested by intervenors, Commissioner Ervin asked Mr. Wilson to provide a late-filed exhibit making recommendations for the development and review of resource adequacy studies in future proceedings. In particular, Commissioner Ervin requested the following:

“...I would like it if you could summarize your recommendations for future proceedings in a late-filed exhibit because you indicated there was some information that was not provided, and we'll be going through this process again and again and again, and so let's see if we can do better the next round. And what that means is we need specific recommendations on, for example, how do we get a sensitivity study and what data did you ask for which was not provided...”<sup>1</sup>

Late-filed Exhibit 15 responds to Commissioner Ervin's request and discusses best practices for performing a resource adequacy study, the need for stakeholder engagement throughout the development of the study, and the importance of sensitivity analyses being made available to intervenors.

Late-filed Exhibit 23 is a copy of the Summary Findings from RTI International's report, *Economic Impact Analysis of Clean Energy Development in North Carolina – 2019 Update*. At the hearing, counsel for Duke Energy Progress and Duke Energy Carolinas agreed to stipulate into the record the report's summary findings as a late-filed exhibit.<sup>2</sup>

We are serving a copy of these late-filed exhibits on the parties of record pursuant to the electronic service agreement in the dockets.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Lauren J. Bowen  
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<sup>1</sup> Tr. Vol. 2, p. 55, l. 14 – p. 56, l. 15.

<sup>2</sup> Tr. Vol. 2, p. 261, l. 20 – p. 262, l. 12.

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via electronic mail with a copy of the late-filed Exhibit Nos. 15 and 23 filed on behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 4th day of November, 2019.

s/ Lauren Fry  
Lauren Fry